

EXHIBIT MM

1 Scott R. Mosko (State Bar No. 106070)
2 FINNEGAN, HENDERSON, FARABOW,
3 GARRETT & DUNNER, L.L.P.
Stanford Research Park
4 700 Hansen Way
Palo Alto, California 94304
Telephone: (650) 849-6600
Facsimile: (650) 849-6666
5

6 Attorneys for Defendants
7 Connectu LLC, Cameron Winklevoss,
Tyler Winklevoss, Howard Winklevoss,
and Divya Narendra
8

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10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF SANTA CLARA
12

13 THE FACEBOOK, INC.

14 Plaintiff,
15 v.

16 CONNECTU LLC, CAMERON WINKLEVOSS,
TYLER WINKLEVOSS, HOWARD
WINKLEVOSS, DIVYA NARENDRA, AND
DOES 1-25,

17 Defendants.
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CASE NO. 105 CV 047381

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**RESPONSE OF DEFENDANT DIVYA
NARENDRA TO FORM
INTERROGATORIES**

1 **Response to 16.6**

2 Not applicable as there was no "unauthorized access of the Facebook's data."

3 **Response to 16.7**

4 Not applicable as there was no "unauthorized access of the Facebook's data."

5 **Response to 16.8**

6 Responding party does not understand Plaintiff is claiming property damage.

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8 **Response to 16.9**

9 Not applicable as there was no "unauthorized access of the Facebook's data."

10 **Response to 17.1**

11 Regarding Request No. 1, Responding Party states he does not have a FACEBOOK
individual member ID.

12 Regarding Request No. 2, Responding Party visited FACEBOOK's website only in his
capacity as a member of ConnectU. See ConnectU's Response to Request No. 2 and its Response to
Interrogatory No. 17.1 as it concerns Request For Admissions, No. 2.

13 Regarding Request No. 3, Responding Party visited FACEBOOK's website only in his
capacity as a member of ConnectU. See ConnectU's Response to Request No. 3 and its Response to
Interrogatory No. 17.1 as it concerns Request For Admissions, No. 3.

14 Regarding Request No. 4, Responding Party visited FACEBOOK's website only in his
capacity as a member of ConnectU. See ConnectU's Response to Request No. 4.

15 Regarding Request No. 5, Responding Party visited FACEBOOK's website only in his
capacity as a member of ConnectU. See ConnectU's Response to Request No. 5.

16 Regarding Request No. 6, Responding Party visited FACEBOOK's website only in his
capacity as a member of ConnectU. See ConnectU's Response to Request No. 6 and its Response to
Interrogatory No. 17.1 as it concerns Request For Admissions, No. 6.

17 Regarding Request No. 7, Responding Party visited FACEBOOK's website only in his
capacity as a member of ConnectU. See ConnectU's Response to Request No. 7.

18 Regarding Request No. 8, Responding Party activities regarding FACEBOOK's website
were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.
8 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 8.

19 Regarding Request No. 9, Responding Party activities regarding FACEBOOK's website
were done only in his capacity as a member of ConnectU.. See ConnectU's Response to Request
No. 9 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 9.

20 Regarding Request No. 10, Responding Party activities regarding FACEBOOK's website
were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.
10 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 10.

1 Regarding Request No. 11, Responding Party activities regarding FACEBOOK's website
2 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.
21 11 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 11.

3 Regarding Request No. 12, Responding Party activities regarding FACEBOOK's website
4 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.
12 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 12.

5 Regarding Request No. 13, Responding Party activities regarding FACEBOOK's website
6 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.
13 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 13.

7 Regarding Request No. 14, Responding Party activities regarding FACEBOOK's website
8 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.
14 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 14.

9 Regarding Request No. 15, Responding Party visited FACEBOOK's website only in his
10 capacity as a member of ConnectU. See ConnectU's Response to Request No. 15 and its Response
10 to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 15.

11 Regarding Request No. 16, Responding Party visited FACEBOOK's website only in his
12 capacity as a member of ConnectU. See ConnectU's Response to Request No. 16.

12 Regarding Request No. 17, Responding Party visited FACEBOOK's website only in his
13 capacity as a member of ConnectU. See ConnectU's Response to Request No. 17 and its Response
13 to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 17.

14 Regarding Request No. 18, Responding Party visited FACEBOOK's website only in his
15 capacity as a member of ConnectU. See ConnectU's Response to Request No. 18 and its Response
15 to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 18.

16 Regarding Request No. 19, Responding Party visited FACEBOOK's website only in his
17 capacity as a member of ConnectU. See ConnectU's Response to Request No. 19 and its Response
17 to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 19.

18 Regarding Request No. 20, Responding Party visited FACEBOOK's website only in his
19 capacity as a member of ConnectU. See ConnectU's Response to Request No. 20 and its Response
19 to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 20.

20 Regarding Request No. 21, Responding Party visited FACEBOOK's website only in his
21 capacity as a member of ConnectU. See ConnectU's Response to Request No. 21 and its Response
21 to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 21.

22 Regarding Request No. 22, Responding Party activities regarding FACEBOOK's website
23 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.
22.

24 Regarding Request No. 23, Responding Party activities regarding FACEBOOK's website
25 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.
25 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 23.

26 Regarding Request No. 24, Responding Party activities regarding FACEBOOK's website
27 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.
27 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 24.

1 Regarding Request No. 25, Responding Party activities regarding FACEBOOK's website
2 were done only in his capacity as a member of ConnectU. See ConnectU's Response to Request No.
25 and its Response to Interrogatory No. 17.1 as it concerns Request For Admissions, No. 25.

3 **Response to 50.3**

4 Responding party does not understand that there is an agreement alleged in the Plaintiff's
5 complaint.

6 **Response to 50.4**

7 Responding party does not understand that there is an agreement alleged in the Plaintiff's
complaint.

8 **Response to 50.5**

9 Responding party does not understand that there is an agreement alleged in the Plaintiff's
complaint.

10 **Response to 50.6**

11 Responding party does not understand that there is an agreement alleged in the Plaintiff's
12 complaint.

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VERIFICATION

DIVYA NARENDRA, under penalty of perjury under the laws of the State of California, states as follows:

4 1. That he is one of the Defendants in the above-entitled action;
5 2. That he has read the foregoing RESPONSE OF DIVYA NARENDRA TO
6 FORM INTERROGATORIES and knows the contents thereof, and that the same is true of
7 his own knowledge, save and except as to the matters which are therein stated on his
8 information or belief, and as to those matters, he believes it to be true.

9 Executed on the 31 day of October, 2005, at NY,NY

Divya Narendra